INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

July 25, 2003

TO: Interested Parties / Applicant

RE: Better Way Partners LLC dba Better Way Products 039-17623-00141

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for consideration at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
Administrator, Christine Todd Whitman
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

July 25, 2003

Mr. Bruce Korenstra
Better Way Partners LLC dba Better Way Products
70891 C. R. 23
New Paris, IN 46996

Re: 039-17623
Second Significant Permit Modification to
Part 70 No.: T 039-7106-00141

Dear Mr. Korenstra:

Better Way Partners LLC dba Better Way Products was issued a Part 70 permit on December 30, 1999 for a fiberglass lamination production plant. A letter requesting changes to this permit was received on April 17, 2003. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of changing the VOC limit for the entire source to less than 250 tons per year, in order to qualify as a minor source under Prevention of Significant Deterioration (PSD) rules.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima D. Moulik, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Madhurima D. Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,
Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
mm
cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Better Way Partners LLC dba Better Way Products, Inc.
70891 C.R. 23
New Paris, Indiana 46553

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-7106-00141	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: December 30, 1999

1st Administrative Amendment No. 039-12115 Issued on: July 6, 2000
1st Significant Permit Modification No. 039-12527 Issued on: November 2, 2000

2nd Significant Permit Modification No.: 039-17623	Pages Modified: 3, 4, 26, 27, 27a, 28-33, 37, 38
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:July 25, 2003

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a fiberglass lamination production plant.

Responsible Official:	Bruce Korenstra
Source Address:	70891 C. R. 23, New Paris, Indiana 46553
Mailing Address:	70891 C. R. 23, New Paris, Indiana 46553
Phone Number:	(219) 831-3340
SIC Code:	3089
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants
	Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program
	Major Source, Section 112 of the Clean Air Act
	Minor Source, under PSD or Emission Offset Rules;

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

Plant 2:

(a) Gelcoat booth, identified as 0243, with a maximum capacity of 143.6 pounds per hour, using dry filters as control, and exhausting to stack E-1.

(b) Resin chop area, identified as 3069, with a maximum capacity of 322.1 pounds per hour, using dry filters as control, and exhausting to stack E-2.

(c) Resin chop area, identified as 4779, with a maximum capacity of 322.1 pounds per hour, using dry filters as control, and exhausting to stack E-3.

(d) Grinding area, identified as 0778, with a maximum capacity of 720.0 pounds per hour, using dry filters as control, and exhausting to stack D-1 & 2.

Plant 1:

(e) One (1) gelcoat booth, known as E-1, equipped with an air-assisted airless spray applicator, equipped with dry filters for overspray control, equipped with a 22,800 cubic feet per minute exhaust fan, capacity: 7.5 fiberglass parts per hour.

(f) One (1) resin booth, known as E-2, equipped with air-assisted airless spray applicators, equipped with dry filters for overspray control, equipped with a 22,800 cubic feet per minute exhaust fan, capacity: 7.5 fiberglass parts per hour.

(g) One (1) grinding area, equipped with two (2) hand grinders, known as D-1 and D-2, each equipped with a vacuum system and cartridge dust collector for particulate matter control, each equipped with a 10,000 cubic feet per minute exhaust fan, capacity: 7.5 fiberglass parts per hour.

(h) Four (4) natural gas-fired infrared space heaters, capacity: 0.125 million British thermal

units per hour, each.

(i) Four (4) natural gas-fired radiant space heaters, capacity: 0.150 million British thermal units per hour, each.

(j) One (1) natural gas-fired air make-up unit, capacity: 4.1 million British thermal units per hour.

(k) Two (2) natural gas-fired office furnaces, capacity: 0.100 million British thermal units per hour, each.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

(b) Combustion source flame safety purging on startup.

(c) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings. Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(d) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).

(e) The following activities in Plant 3 with emissions below exemption levels as defined in 326 IAC 2-1.1-3: woodworking, mold making including gel coat and resin application, and grinding.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Plant 2:

(a) Gelcoat booth, identified as 0243, utilizing air assisted airless spray guns with a maximum capacity of 143.6 pounds per hour, using dry filters as control, and exhausting to stack E-1.

(b) Resin chop area, identified as 3069, utilizing air assisted airless spray guns with a maximum capacity of 322.1 pounds per hour, using dry filters as control, and exhausting to stack E-2.

(c) Resin chop area, identified as 4779,utilizing air assisted airless spray guns with a maximum capacity of 322.1 pounds per hour, using dry filters as control, and exhausting to stack E-3.

(d) Grinding area, identified as 0778, with a maximum capacity of 720.0 pounds per hour, using dry filters as control, and exhausting to stack D-1 & 2.

Facility Description [326 IAC 2-7-5(15)

Plant 1:

(e) One (1) gelcoat booth, known as E-1, equipped with an air-assisted airless spray applicator, equipped with dry filters for overspray control, equipped with a 22,800 cubic feet per minute exhaust fan, capacity: 7.5 fiberglass parts per hour.

(f) One (1) resin booth, known as E-2, equipped with air-assisted airless spray applicators, equipped with dry filters for overspray control, equipped with a 22,800 cubic feet per minute exhaust fan, capacity: 7.5 fiberglass parts per hour.

(g) One (1) grinding area, equipped with two (2) hand grinders, known as D-1 and D-2, each equipped with a vacuum system and cartridge dust collector for particulate matter control, each equipped with a 10,000 cubic feet per minute exhaust fan, capacity: 7.5 fiberglass parts per hour.

(h) Four (4) natural gas-fired infrared space heaters, capacity: 0.125 million British thermal units per hour, each.

(i) Four (4) natural gas-fired radiant space heaters, capacity: 0.150 million British thermal units per hour, each.

(j) One (1) natural gas-fired air make-up unit, capacity: 4.1 million British thermal units per hour.

(k) Two (2) natural gas-fired office furnaces, capacity: 0.100 million British thermal units per hour, each.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

(a) The total potential to emit of VOC from the Plant 1 and Plant 2 shall be limited to less than 250 tons, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period, based on a rolling total. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable. VOC emissions shall be calculated from VOC applied to the applicators, using the following method:

Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) *
EF (VOC monomer emission factor for resin or gel coat used, %);

EF, VOC monomer emission factor = emission factor, expressed as pounds (lbs) VOC emitted per ton of resin/gel coat processed, which is indicated by the VOC monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

(b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: “Unified Emission Factors for Open Molding Composites”, Composites Fabricators Association, April 20, 1999, . The emission factors used for monomers that is styrene shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

D.1.2 Volatile Organic Compounds (BACT) [326 IAC 8-1-6]

. (a) BACT/MACT for Plant No. 2 was determined to be the as installed air-assisted airless spray applicators with a VOC limit of 245 tons per rolling 12-month period, a maximum styrene content of the resins used of 60.0 percent by weight. Compliance with this limit shall be determined based upon the following criteria:

(1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic chemical emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

(2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding Composites", Composites Fabricators Association, April 20, 1999, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

(b) For Plant No. 1, pursuant to 326 IAC 8-1-6 and 326 IAC 2-1-3.4, the as-installed air assisted airless spray applicators shall be used at all times during resin and gelcoat fiberglass products spraying operations and the potential to emit of VOC shall not exceed 228 tons per rolling 12-month period, with a maximum styrene content of the resins used of 60.0 percent by weight.

(c) Plant 1 and Plant 2 are subject to the following workplace standards:

(1) All resins and gelcoats will be applied with air-assisted airless spray applicators.

(2) Spray applicators will be cleaned with acetone.

(3) The cleanup solvent containers used to transport solvent other than acetone from drums to work stations be closed containers having soft gasketed spring-loaded closures.

(4) Cleanup rags saturated with solvent other than acetone shall be stored, transported, and disposed of in containers that are closed tightly.

(5) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent other than acetone into the air.

(6) The overspray shall be minimized by spraying as close as practical into the molds.

(7) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize the overspray emitted on the floor and into the air filters.

(8) Storage containers used to store VOC's materials shall be kept covered when not in use.

(c) Air-assisted airless spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

(a) The PM from the fiberglass lamination production processes in Plant 1 and Plant 2 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

(b) Pursuant to 326 IAC 6-3-2 the PM from the grinding operations in Plant 2, shall not exceed 2.1 pounds per hour when operating at a process weight rate of 720 pounds per hour, and the PM from the grinding operations in Plant 1 shall not exceed 2.17 pounds per hour when operating at a process weight rate of 775 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D 1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D 1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.8 Particulate Matter (PM)

Pursuant to CP 039-2414, issued on September 24, 1996 the dry filters for PM control shall be in operation at all times when the grinding area in Plant 2 is in operation. The dust collector shall be in operation at all times when the grinding area in Plant 1 is in operation.

D.1.9 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be

made of the overspray from the surface coating booth stacks (E1, E2, E3) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1 and D.1.2.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The non-acetone cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Better Way Partners LLC DBA Better Way Products
Source Location: 70891 C. R. 23, New Paris, IN 46553
Mailing Address: 70891 C. R. 23, New Paris, IN 46553
Part 70 Permit No. T039-7106-00141
Facility: Plant 1 and Plant 2
Parameter: VOC
Limit: Less than 250 tons/year

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC This Month	VOC Previous 11 Months	VOC 12 Month Total
Month 1			

Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Modification

Source Background and Description

Source Name:	**Better Way Partners LLC dba Better Way Products, Inc.**
Source Location:	**70891 C. R. 23, New Paris, IN 46996**
County:	**Elkhart**
SIC Code:	**3089**
Operation Permit No.:	**T039-7106-00141**
Operation Permit Issuance Date:	**December 30, 1999**
Significant Permit Modification No.:	**039-17623-00141**
Permit Reviewer:	**Madhurima D. Moulik**

The Office of Air Quality (OAQ) has reviewed a modification application from Better Way Products, Inc., relating to the operation of fiberglass lamination production.

History

Better Way Products, Inc. was issued a Part 70 permit on December 30, 1999. On April 17, 2003, Better Way Products, Inc., submitted an application to modify the permit. The source requests that the entire source, including Plant 1 and Plant 2, be reclassified as Minor for Prevention of Significant Deterioration (PSD) regulations by limiting the total emissions of VOCs to less than 250 tons per year. Better Way Product, Inc.'s quarterly reports and annual emissions statements attest to the fact that the total actual emissions from the source, including emissions from Plant 1 and Plant 2, are below 250 tons per year.

In addition, Better Way Products, Inc. requested minor descriptive changes to the permit, which were incorporated into this Significant Permit Modification.

Existing Approvals

The source was issued a Part 70 Operating Permit T039-7106-00141 on December 30, 1999. The source has since received the following:

(a) First Administrative Amendment No.: 039-12115, issued on July 6, 2000; and

(b) First Minor Permit Modification No.: 039-12527, issued on November 2, 2000.

Enforcement Issue

There are no enforcement actions pending.

Justification for the Modification

The Part 70 permit is being modified by a Significant Permit Modification pursuant to 326 IAC 2-7-

12(d)(1), which states that "every significant change in existing monitoring Part 70 permit terms and conditions" shall be considered significant. The requested changes meet this requirement, therefore a Significant Permit Modification will be issued.

Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on April 17, 2003.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Uncontrolled Potential To Emit [1] (tons/year)	Controlled/Limited Potential To Emit (tons/year)
PM	89.6	89.6
PM-10	89.6	89.6
SO_2	0.014	0.014
VOC	659.6	[2] less than 250
CO	0.605	0.605
NO_x	2.33	2.33

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Uncontrolled potential to Emit [1] (tons/year)	Controlled/Limited Potential To Emit (tons/year)
Styrene	>10	>10
Methyl Methacrylate	>10	>10
TOTAL	>25	***>25***

[1] The potential to emit of pollutants is the total PTE for Plant 1 and Plant 2. Plant 1 data is based on Technical Support Document for Part 70 permit No. T039-7106-00141. Plant 2 data is based on Technical Support Document for CP No. 039-8708-00141.

[2] The source has opted to limit the total VOC potential to emit of Plant 1 and Plant 2 to less than 250 tons per year, in order to be classified as a minor source under PSD regulations.

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOCs are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year.

Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	Not Available
PM-10	Not Available
SO_2	Not Available
VOC	113
CO	Not Available
NO_x	Not Available
HAP (specify)	Not Available

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21. See the State Rule Applicability for the source section.

(b) Elkhart County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21. See the State Rule Applicability for the source section.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source, which was earlier classified as a PSD major source, has chosen to limit potential VOC emissions to less than 250 tons per year. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source had submitted a Preventive Maintenance Plan (PMP) on November 7, 1996 for Part 70 No. T039-7106-00141. This PMP had been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 1-5-2 (Emergency Reduction Plans)

The source had submitted an Emergency Reduction Plan (ERP) on November 7, 1996 for Part 70 No. T039-7106-00141. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC for Elkhart county. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-2 (Prevention of Significant Deterioration)

(a) The total potential to emit of VOC from the Plant 1 and Plant 2 shall be limited to less than 250 tons, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period, based on a rolling total. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable. VOC emissions shall be calculated from VOC applied to the applicators, using the following method:

Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton)
EF (VOC monomer emission factor for resin or gel coat used, %);

EF, VOC monomer emission factor = emission factor, expressed as pounds (lbs) VOC

emitted per ton of resin/gel coat processed, which is indicated by the VOC monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

(b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding Composites", Composites Fabricators Association, April 20, 1999, . The emission factors used for monomers that is styrene shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

326 IAC 8-1-6 and 326 IAC 2-1-3.4 (BACT/MACT Conditions)

(a) BACT/MACT for Plant No. 1 was determined to be the as installed air-assisted airless spray applicators with a VOC limit of 245 tons per rolling 12-month period, a maximum styrene content of the resins used of 60.0 percent by weight. Compliance with this limit shall be determined based upon the following criteria:

(1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic chemical emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

(2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding Composites", Composites Fabricators Association, April 20, 1999, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

For Plant No. 2, pursuant to 326 IAC 8-1-6 and 326 IAC 2-1-3.4, the as-installed air assisted airless spray applicators shall be used at all times during resin and gelcoat fiberglass products spraying operations and the potential to emit of VOC shall not exceed 228 tons per rolling 12-month period, with a maximum styrene content of the resins used of 60.0 percent by weight.

Plant 1 and Plant 2 are subject to the following workplace standards:

(i) All resins and gelcoats will be applied with air-assisted airless spray applicators.

(ii) Spray applicators will be cleaned with acetone.

(iii) The cleanup solvent containers used to transport solvent other than acetone from drums to work stations be closed containers having soft gasketed spring-loaded closures.

(iv) Cleanup rags saturated with solvent other than acetone shall be stored, trans-

ported, and disposed of in containers that are closed tightly.

(v) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent other than acetone into the air.

(vi) The overspray shall be minimized by spraying as close as practical into the molds.

(vii) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize the overspray emitted on the floor and into the air filters.

(viii) All solvent other than acetone sprayed during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(ix) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.

(b) Air-assisted airless spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

All other state rule applicabilities for individual facilities remain unchanged.

Compliance Requirements

Permits issued under 326 IAC 2-7are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source remain unchanged from the Significant Permit Modification No. 039-12527-00141.

Conclusion

The operation of this fiberglass manufacturing operation shall be subject to the conditions of the attached proposed Significant Permit Modification No. 039-17623-00141.

CHANGES TO PART 70 PERMIT

The Part 70 permit is modified as follows (~~strikeout~~ to show deletions and **bold** to show additions):

(1) The source is being designated as a PSD minor source in Section A.1.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates

Responsible Official:	Bruce Korenstra
Source Address:	70891 C. R. 23, New Paris, Indiana 46553
Mailing Address:	70891 C. R. 23, New Paris, Indiana 46553
Phone Number:	(219) 831-3340
SIC Code:	3089
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, Section 112 of the Clean Air Act ~~Major Source~~ **Minor Source**, under PSD or Emission Offset Rules;

(2) The source requested that what was so far referred to as Plant 1 be designated as Plant 2, and vice versa. Therefore, section A.2 is amended as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

~~Plant 1:~~ **Plant 2:**

(a) Gelcoat booth, identified as 0243, with a maximum capacity of 143.6 pounds per hour, using dry filters as control, and exhausting to stack E-1.

(b) Resin chop area, identified as 3069, with a maximum capacity of 322.1 pounds per hour, using dry filters as control, and exhausting to stack E-2.

(c) Resin chop area, identified as 4779, with a maximum capacity of 322.1 pounds per hour, using dry filters as control, and exhausting to stack E-3.

(d) Grinding area, identified as 0778, with a maximum capacity of 720.0 pounds per hour, using dry filters as control, and exhausting to stack D-1 & 2.

~~Plant 2:~~ **Plant 1:**

(e) One (1) gelcoat booth, known as E-1, equipped with an air-assisted airless spray applicator, equipped with dry filters for overspray control, equipped with a 22,800 cubic feet per minute exhaust fan, capacity: 7.5 fiberglass parts per hour.

…….

(3) At the sources's request, section A.3 is modified as follows:

A.3 ~~Specifically Regulated~~ Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities ~~which are specifically regulated~~, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

(b) Combustion source flame safety purging on startup.

(c) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings. Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(d) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).

(e) The following activities in Plant 3 with emissions below exemption levels as defined in 326 IAC 2-1.1-3: woodworking, mold making including gel coat and resin application, and grinding.

(4) Facility description in Section D.1 is modified as follows:

Facility Description [326 IAC 2-7-5(15)]:

~~Plant 1~~ **Plant 2**:

(a) Gelcoat booth, identified as 0243, utilizing air assisted airless spray guns with a maximum capacity of 143.6 pounds per hour, using dry filters as control, and exhausting to stack E-1.

(b) Resin chop area, identified as 3069, utilizing air assisted airless spray guns with a maximum capacity of 322.1 pounds per hour, using dry filters as control, and exhausting to stack E-2.

(c) Resin chop area, identified as 4779,utilizing air assisted airless spray guns with a maximum capacity of 322.1 pounds per hour, using dry filters as control, and exhausting to stack E-3.

(d) Grinding area, identified as 0778, with a maximum capacity of 720.0 pounds per hour, using dry filters as control, and exhausting to stack D-1 & 2.

Plant 1:

(e) One (1) gelcoat booth, known as E-1, equipped with an air-assisted airless spray applicator, equipped with dry filters for overspray control, equipped with a 22,800 cubic feet per minute exhaust fan, capacity: 7.5 fiberglass parts per hour.

(f) One (1) resin booth, known as E-2, equipped with air-assisted airless spray applicators, equipped with dry filters for overspray control, equipped with a 22,800 cubic feet per minute exhaust fan, capacity: 7.5 fiberglass parts per hour.

(g) One (1) grinding area, equipped with two (2) hand grinders, known as D-1 and D-2, each equipped with a vacuum system and cartridge dust collector for particulate matter control, each equipped with a 10,000 cubic feet per minute exhaust fan, capacity: 7.5 fiberglass parts per hour.

(h) Four (4) natural gas-fired infrared space heaters, capacity: 0.125 million British thermal units per hour, each.

(i) Four (4) natural gas-fired radiant space heaters, capacity: 0.150 million British thermal units per hour, each.

(j) One (1) natural gas-fired air make-up unit, capacity: 4.1 million British thermal units per hour.

(k) Two (2) natural gas-fired office furnaces, capacity: 0.100 million British thermal units per hour, each.

(5) Condition D.1.1 is amended as follows:

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

~~(a) The potential to emit of VOC from the units designated as 0243, 3069 and 4779, shall be limited to less than 250 tons, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period, based on a rolling total. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.~~

(a) The total potential to emit of VOC from the Plant 1 and Plant 2 shall be limited to less than 250 tons, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period, based on a rolling total. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable. VOC emissions shall be calculated from VOC applied to the applicators, using the following method:

Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF (VOC monomer emission factor for resin or gel coat used, %);

EF, VOC monomer emission factor = emission factor, expressed as pounds (lbs) VOC emitted per ton of resin/gel coat processed, which is indicated by the VOC monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

(b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding Composites", Composites Fabricators Association, April 20, 1999, . The emission factors used for monomers that is styrene shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

(6) Section D.1.2 is amended as follows:

D.1.2 Volatile Organic Compounds (BACT) [326 IAC 8-1-6]

~~(a) The as-installed air assisted airless spray applicators shall be used at all times during resin and gelcoat fiberglass products spraying operations. BACT/MACT was determined to be the as installed air-assisted airless spray applicators with a VOC limit of 245 tons per rolling 12-month period, a maximum styrene content of the resins used of 60.0 percent by weight and the following workplace standards:~~

(a) BACT/MACT for Plant No. 2 was determined to be the as installed air-assisted airless spray applicators with a VOC limit of 245 tons per rolling 12-month period, a maximum styrene content of the resins used of 60.0 percent by weight. Compliance with this limit shall be determined based upon the following criteria:

(1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic chemical emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

(2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding Composites", Composites Fabricators Association, April 20, 1999, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

(b) For Plant No. 1, pursuant to 326 IAC 8-1-6 and 326 IAC 2-1-3.4, the as-installed air assisted airless spray applicators shall be used at all times during resin and gelcoat fiberglass products spraying operations and the potential to emit of VOC shall not exceed 228 tons per rolling 12-month period, with a maximum styrene content of the resins used of 60.0 percent by weight.

(c) Plant 1 and Plant 2 are subject to the following workplace standards:

(1) All resins and gelcoats will be applied with air-assisted airless spray applicators.

(2) Spray applicators will be cleaned with acetone.

(3) The cleanup solvent containers used to transport solvent other than acetone from drums to work stations be closed containers having soft gasketed spring-loaded closures.

(4) Cleanup rags saturated with solvent other than acetone shall be stored, transported, and disposed of in containers that are closed tightly.

(5) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent other than acetone into the air.

(6) The overspray shall be minimized by spraying as close as practical into the molds.

(7) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize the overspray emitted on the floor and into the air filters.

(8) Storage containers used to store VOC's materials shall be kept covered when not in use.

~~BACT for these facilities shall be satisfied by the requirements specified in part (a) of this condition which shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.~~

(**d** ~~c~~) Air-assisted airless spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(7) Condition D.1.3 is modified as follows:

(a) The PM from the fiberglass lamination production **processes in Plant 1 and Plant 2** shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

(b) Pursuant to 326 IAC 6-3-2 the PM from the grinding operations **in Plant 2**, shall not exceed 2.1 pounds per hour when operating at a process weight rate of 720 pounds per hour, **and the PM from the grinding operations in Plant 1, shall not exceed 2.17 pounds per hour when operating at a process weight rate of 775 pounds per hour.**

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

(8) Section D.1.8 is modified as follows:

D.1.8 Particulate Matter (PM)

Pursuant to CP 039-2414, issued on September 24, 1996 the dry filters for PM control shall be in operation at all times when the grinding **area in Plant 2** is in operation. **The dust collector shall be in operation at all times when the grinding area in Plant 1 is in operation.**

(9) Section D.1.10 is modified as follows:

D.1.10 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 **and D.1.2** the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1 **and D.1.2**.

(10) The entire section D.2 is deleted as follows:

~~**SECTION D.2 FACILITY OPERATION CONDITIONS**~~

~~**Facility Description [326 IAC 2-7-5(15)**~~

~~**Plant 2:**~~

~~(e) One (1) gelcoat booth, known as E-1, equipped with an air-assisted airless spray applicator, equipped with dry filters for overspray control, equipped with a 22,800 cubic feet per minute exhaust fan, capacity: 7.5 fiberglass parts per hour.~~

~~(f) One (1) resin booth, known as E-2, equipped with air-assisted airless spray applicators, equipped with dry filters for overspray control, equipped with a 22,800 cubic feet per minute exhaust fan, capacity: 7.5 fiberglass parts per hour.~~

~~(g) One (1) grinding area, equipped with two (2) hand grinders, known as D-1 and D-2, each equipped with a vacuum system and cartridge dust collector for particulate matter control, each equipped with a 10,000 cubic feet per minute exhaust fan, capacity: 7.5 fiberglass parts per hour.~~

~~(h) Four (4) natural gas-fired infrared space heaters, capacity: 0.125 million British thermal units per hour, each.~~

~~(i) Four (4) natural gas-fired radiant space heaters, capacity: 0.150 million British thermal units per hour, each.~~

~~(j) One (1) natural gas-fired air make-up unit, capacity: 4.1 million British thermal units per hour.~~

~~(k) Two (2) natural gas-fired office furnaces, capacity: 0.100 million British thermal units per hour, each.~~

~~(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)~~

~~**Emission Limitations and Standards [326 IAC 2-7-5(1)]**~~

~~D.2.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]~~

~~(a) The potential to emit of VOC from the units designated as E-1 and E-2, shall be limited to less than 249 tons, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period, based on a rolling total. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply. VOC emissions shall be calculated from VOC applied to the applicators, using the following method:~~

~~Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF (VOC monomer emission factor for resin or gel coat used, %);~~

EF, VOC monomer emission factor = emission factor, expressed as pounds (lbs) VOC emitted per ton of resin/gel coat processed, which is indicated by the VOC monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

(b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: "Unified Emission Factors for Open Molding Composites", Composites Fabricators Association, April 20, 1999, . The emission factors used for monomers that is styrene shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

D.2.2 Particulate Matter (PM) Limitation [326 IAC 6-3]

(a) The PM emissions from the fiberglass lamination production shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

(b) Pursuant to 326 IAC 6-3-2 the PM from the grinding operations, shall not exceed 2.17 pounds per hour when operating at a process weight rate of 775 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.3 BACT/MACT Condition [326 IAC 8-1-6] [326 IAC 2-1-3.4]

(a) That pursuant to 326 IAC 8-1-6 and 326 IAC 2-1-3.4, the as installed air assisted airless spray applicators shall be used at all times during resin and gelcoat fiberglass products spraying operations and the potential to emit of VOC shall not exceed 228 tons per rolling 12-month period, with a maximum styrene content of the resins used of 60.0 percent by weight and the following workplace standards:

(i) All resins and gelcoats will be applied with air-assisted airless spray applicators.

(ii) Spray applicators will be cleaned with acetone.

(iii) The cleanup solvent containers used to transport solvent other than acetone from drums to work stations be closed containers having soft gasketed spring-loaded closures.

(iv) Cleanup rags saturated with solvent other than acetone shall be stored, transported, and disposed of in containers that are closed tightly.

(v) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent other than acetone into the air.

(vi) The overspray shall be minimized by spraying as close as practical into the molds.

(vii) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize the overspray emitted on the floor and into the air filters.

(viii) All solvent other than acetone sprayed during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(ix) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.

(b) Air-assisted airless spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

Compliance Determination Requirements

D.2.4 Particulate Matter (PM)

The dust collector shall be in operation at all times when the grinding area is in operation.

D.2.5 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the fiberglass stacks (E1, E2) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the fiberglass emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

~~**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**~~

~~D.2.6 Record Keeping Requirements~~

~~(a) To document compliance with Conditions D.2.1 and D.2.3 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1 and D.2.3.~~

~~(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~

~~(2) A log of the dates of use;~~

~~(3) The non-acetone cleanup solvent usage for each month;~~

~~(4) The total VOC usage for each month; and~~

~~(5) The weight of VOCs emitted for each compliance period.~~

~~(b) To document compliance with Condition D.2.5, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.~~

~~(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

~~D.2.7 Reporting Requirements~~

~~A quarterly summary of the information to document compliance with Conditions D.2.1 and D.2.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.~~

(11) The Part 70 Quarterly Report is modified as follows:

Part 70 Quarterly Report

Source Name: Better Way Partners LLC DBA Better Way Products
Source Location: 70891 C. R. 23, New Paris, IN 46553
Mailing Address: 70891 C. R. 23, New Paris, IN 46553
Part 70 Permit No. T039-7106-00141
Facility: ~~Fiberglass operations (Resin & Gelcoat units designated as 0243, 3069 and 4779)~~ **Plant 1 and Plant 2**
Parameter: VOC
Limit: Less than ~~245~~ **250** tons/year

(12) The Part 70 Quarterly Report for Plant 2 is deleted:

~~Part 70 Quarterly Report~~

~~Source Name: Better Way Partners LLC DBA Better Way Products~~
~~Source Location: 70891 C. R. 23, New Paris, IN 46553~~
~~Mailing Address: 70891 C. R. 23, New Paris, IN 46553~~
~~Part 70 Permit No. T039-7106-00141~~
~~Facility: Fiberglass operations (Resin & Gelcoat units designated as E-1 and E-2)~~
~~Parameter: VOC~~
~~Limit: Less than 228 tons/year~~

(13) The Table of Contents is modified as follows to delete references to Section D.2: